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June 29th, 1994

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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JUN 30 1994

FCC MAIL ROOM

Re : ET Docket No. 94-32

Dear Mr. Caton:

Transmitted herewith are an original and nine (9) copies of the Reply Comments of Western Multiplex Corporation in response to the above Notice of Inquiry by the Commission released on May 4th, 1994.

Please address any questions concerning this matter directly to the undersigned.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Graham Barnes', is written over a horizontal line.

Graham Barnes
Director of Marketing

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JUN 30 1994

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of
Allocation of Spectrum Below
5 GHz Transferred from
Federal Government Use

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)
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)

ET Docket No. 94-32

To : The Commission

REPLY COMMENTS
on
NOTICE OF INQUIRY
by
WESTERN MULTIPLEX CORPORATION

I. INTRODUCTION

Pursuant to Sections 1.415 and 1.419 of the Commission's Rules, Western Multiplex Corporation (WMC) hereby submits these reply comments on the proceeding to seek information on potential applications for 50 MHz of spectrum that is being transferred immediately from Federal Government to private sector use as required by the Omnibus Budget Reconciliation Act of 1993.

II. PROPOSED SPECTRUM IS NOT USEFUL FOR REALLOCATION

1. WMC agrees with the overwhelming majority of the more than 50 commenters in this proceeding, who stated that the proposed spectrum was not useful for reallocation. The comments of the TIA are especially clear in explaining that this spectrum reallocation proposal is very disappointing because all bands below 3 GHz are already allocated to other services and no useful spectrum has been released from Federal government use.

2. WMC notes that 18 other commenters explicitly supported the COPE petition which requires a substantial allocation of spectrum for emerging technologies for private mobile use. Unfortunately, the proposed spectrum does not appear to be useful in any significant way for implementing the COPE petition.

3. WMC urges the FCC to call for the rapid availability of spectrum released from genuinely exclusive Federal government allocation, for example, the 1710 - 1850 MHz band, that would be more useful.

III. CONTINUED USE OF 2400 - 2483.5 MHz BY PART 15 DESIREABLE

WMC agrees with a large number of commenters (Interdigital, Part 15 Coalition, AT&T, Symbol Technologies, Itron, GEC Plessey, Southern Company, Apple and UTC) who explicitly supported the continuing use of the 2400 - 2483.5 MHz band by Part 15 devices. In order to ensure this continuing use, WMC agrees that no part of this band should be reallocated.

IV. NO PRIMARY USE OF 2400 - 2483.5 MHz DESIREABLE

1. Western Multiplex agrees with the many Amateur radio commenters that it is not desireable to allocate any primary service in the band 2400 - 2483.5 MHz because of the extensive use of this band, mainly by Part 15 and ISM devices. In fact, shared use between Amateur service and commercial service is difficult and becomes impossible if there is any licensed primary service allocated.


2. Western Multiplex does not agree that unlicensed Part 15 use should be coordinated with Amateur users because both services are operating on an established secondary basis where the desireability of rapid deployment and mobility is essential.

V. CONCLUSION

In summary, WMC agrees with the consensus of comments in the proceeding which show that the proposed spectrum is not suitable for reallocation. WMC agrees that no reallocation of any part of the 2400 - 2483.5 MHz band is desireable and that no primary service user should be placed in this band.

Respectfully submitted,

WESTERN MULTIPLEX CORPORATION

By : 

Date : June 29th, 1994

Graham R. Barnes
Director of Marketing

Western Multiplex Corporation
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